



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-3

February 3, 2000

Charles E. Woodhouse, Treasurer
Gibson Dunn & Crutcher LLP PAC
333 South Grand Avenue
Los Angeles, CA 90071

Identification Number: C00344754

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Mr. Woodhouse:

This letter is to inform you that as of February 2, 2000, the Commission has not received your response to our request for additional information, dated January 12, 2000. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Lucy J. Denny on our toll-free number (800) 424-9530 or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson", is written over the typed name.

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charles E. Woodhouse, Treasurer
Gibson Dunn & Crutcher LLP PAC
333 South Grand Avenue
Los Angeles, CA 90071

JAN 12 2000

Identification Number: C00344754

Reference: Mid-Year Report (1/1/99-6/30/99)

Dear Mr. Woodhouse:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a non-multicandidate political committee and its affiliates, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$1,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A, supporting Line 16 of the report covering the period during which they are

received. Any redesignations should be disclosed as memo entries on Schedule B, supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Your report discloses no payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please verify that all expenses referenced above (i.e., rent, salaries, utilities, etc.) have been adequately disclosed. If these services have been provided by volunteers, please confirm this in writing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely,



Lucy J. Denny
Reports Analyst
Reports Analysis Division

SCHEDULE B**ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER
23

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)**GIBSON DUNN & CRUTCHER LLP PAC****Full Name, Mailing Address, and ZIP Code**FRIENDS OF GIULIANI EXPLORATORY COMMITTEE
250 BROADWAY SUITE 2104

NEW YORK NY 10007

Purpose of Disbursement(Senate - NY - 00)
Friends of Giuliani/Senate**Date (month,
day, year)**

05/10/1998

**Amount of Each
Disbursement This
Period**
2000.00Disbursement for: ☐ Primary ☒ General☐ Other (specify):**Full Name, Mailing Address, and ZIP Code**LIEBERMAN 2000 COMMITTEE
P O BOX 231294 STATE HOUSE SQUARE

HARTFORD CT 06123

Purpose of Disbursement(Senate - CT - 00)
Lieberman 2000**Date (month,
day, year)**

05/10/1998

**Amount of Each
Disbursement This
Period**
500.00Disbursement for: ☒ Primary ☐ General☐ Other (specify):**Full Name, Mailing Address, and ZIP Code**BERMAN FOR CONGRESS
6665 WHILSHIRE 91 SUITE 220

BEVERLY HILLS CA 90211

Purpose of Disbursement

(House - CA - 25)

**Date (month,
day, year)**

08/09/1998

**Amount of Each
Disbursement This
Period**
500.00Disbursement for: ☒ Primary ☐ General☐ Other (specify):**SUBTOTALS** of Disbursements This Page (Optional)**TOTALS** This Period (last page this line number only)

3000.00

